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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 DANIEL JUAREZ, Individually
18 Plaintiff,

19 vs.

20 ZACHARY KEATON, Individually DOES I-X;
21 and ROE CORPORATIONS I-X;
22 Defendants.

CASE NO.: 2:22-cv-00481-GMN-BNW

23 **STIPULATION AND ORDER TO**
24 **REMAND ACTION TO THE EIGHT**
25 **JUDICIAL DISTRICT COURT**
26 **OF NEVADA**

27 Defendant, ZACHARY KEATON, by and through his attorneys, Matthew A. Cavanaugh,
28 Esq. and Steven L. Foremaster, Esq., of Lewis Brisbois Bisgaard Smith, Plaintiff DANIEL
JUAREZ, by and through his counsel, Eric Willoughby, Esq., of Willoughby Shulman Injury
Lawyers, hereby stipulate and respectfully request that the Court Remand this action to the Eight
Judicial District Court in Clark County, Nevada. Specifically, the parties stipulate as follows:

1. On December 10, 2021, Plaintiff Daniel Juarez (“Plaintiff”) commenced an action in the
Eighth Judicial District Court, Clark County, State of Nevada, entitled *Daniel Juarez v. Zachary
Keaton et al.*, Case No. A-21-845254-C.

2. Defendant removed this matter to the U.S. District Court of Nevada on March 17, 2022.

3. On March 17, 2022, Defendant filed his Answer to Plaintiff’s Complaint in the Eighth
Judicial District Court, Clark County, State of Nevada.

4. The parties agree and hereby stipulate that by agreeing herein to remand back to State Court,

1 that Defendant does not waive any right to remove this case back to federal court, if in the future,
2 events occur which cause this case to be appropriate for removal.

3 5. Consequently, Plaintiff and Defendant respectfully request that the Court enter the order
4 remanding this action to the Eighth Judicial District Court.

5 DATED this 15th day of April, 2022.

DATED this 15th day of April, 2022.

6 LEWIS BRISBOIS BISGAARD & SMITH

WILLOUGHBY SHULMAN

7 /s/ Steven L. Foremaster

/s/ Eric Willoughby

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Daniel Juarez

12 *Attorneys for Defendant*

Zachary Keaton

13 **ORDER**

14 **IT IS SO ORDERED.**

15 **IT IS FURTHER ORDERED** that the Clerk is
16 instructed to close the case.

17 Dated this 15 day of April, 2022.

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19
20 
21 Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

22 Submitted By:

23 LEWIS BRISBOIS BISGAARD & SMITH LLP

24 /s/ Steven L. Foremaster

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